

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

----- :
BERTRAM LOEB, :

Plaintiff, :

v. :

Civil Action
No. 02-3833

BANK OF AMERICA :

and :

HERBERT S. GARTEN, ESQUIRE; :

SHELDON G. DAGURT, ESQUIRE; :

FEDDER AND GARTEN :

PROFESSIONAL ASSOCIATION :

Defendants. :
----- :

**MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW JAY GRAHAM
AND GEOFFREY H. GENTH**

Defendants Herbert S. Garten, Esquire, Sheldon G. Dagurt, Esquire, and Fedder and Garten Professional Association, by and through their attorneys, Duane Morris LLP, and Melissa H. Maxman, Esquire, hereby move for the admission *pro hac vice* of Andrew Jay Graham and Geoffrey H. Genth, to appear before this Court on behalf of Defendants. In support of this Motion, Defendants aver as follows:

1. Undersigned moving counsel is a partner at Duane Morris LLP and a member in good standing of the Bars of the Eastern District of Pennsylvania, the Commonwealth of Pennsylvania, and the District of Columbia.
2. Andrew Jay Graham, Esquire, is a principal at the law firm of Kramon & Graham, P.A., One South Street, Suite 2600, Baltimore, MD 21202; telephone: (410) 752-6030 and fax: (410) 539-1269.

3. Mr. Graham is a member in good standing of the Bars of New York, Maryland, and the District of Columbia. Mr. Graham is admitted to practice in the states of New York, Maryland, and the District of Columbia, and before the United States Supreme Court and the United States District Court for the District of Maryland (Bar No. 00080).
4. Geoffrey H. Genth, Esquire, is a principal at the law firm of Kramon & Graham, P.A., One South Street, Suite 2600, Baltimore, MD 21202; telephone: (410) 752-6030 and fax: (410) 539-1269.
5. Mr. Genth is a member in good standing of the Bars of New York and Maryland. Mr. Genth is admitted to practice in the states of New York and Maryland, and before the United States District Court for the District of Maryland (Bar No. 08735).
6. Mr. Genth and Mr. Graham are counsel to Defendants Herbert S. Garten, Esquire, Sheldon G. Dagurt, Esquire, and Fedder and Garten Professional Association, and their participation before the Court would be helpful in the interests of justice, and in proper and efficient disposition of the matters before the Court.
7. Should the Court grant this Motion, the undersigned counsel will act as co-counsel during the pendency of this matter.
8. Mr. Graham and Mr. Genth's affidavits in support of this motion are attached hereto as Exhibits A and B, respectively.

WHEREFORE, Defendants Herbert S. Garten, Esquire, Sheldon G. Dagurt, Esquire, Fedder and Garten Professional Association, and undersigned counsel respectfully request that this Court grant their Motion for the *Pro Hac Vice* Admission of Andrew Jay Graham and Geoffrey H. Genth.

Respectfully Submitted,

DUANE MORRIS LLP

By: _____
Melissa H. Maxman, Esquire
P.A. I.D. No. 58009
One Liberty Place
Philadelphia, PA 19103
(215) 979-1173

Attorneys for Defendants Herbert S. Garten, Esquire
Sheldon G. Dagurt, Esquire, and Fedder and Garten
Professional Association.

Dated: August 22, 2002

CERTIFICATE OF SERVICE

I, Charlene Keller Fullmer, Esquire, hereby certify that on this 22nd day of August, 2002, a true and correct copy of the Motion for *Pro Hac Vice* Admission of Andrew Jay Graham, Esquire and Geoffrey H. Genth, Esquire was served via first class mail upon the following persons:

Paul A. Logan, Esquire
Malcolm B. Jacobson, Esquire
Thomas J. Bogar, Esquire
Kevin K. Carton, Jr.
Powell, Trachtman, Logan, Carrle,
Bowman & Lombardo, P.C.
475 Allendale Road, Suite 200
King of Prussia, Pennsylvania 19406;

and

Mark A. Klugheit, Esquire
Erin A. Brennan, Esquire
Dechert
4000 Bell Atlantic Tower
1717 Arch Street
Philadelphia, Pennsylvania 19103.

Charlene Keller Fullmer, Esquire

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FEDDER AND GARTEN	:	
PROFESSIONAL ASSOCIATION	:	
	:	
Defendants.	:	
-----	:	

ORDER

AND NOW, on this _____ day of _____, 2002, it is hereby ORDERED
and DECREED that the Motion for *Pro Hac Vice* Admission of Andrew Jay Graham and
Geoffrey H. Genth is GRANTED.

BY THE COURT:

J.